Attachment 21.
Rindy -
FYI

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

444 Hospital Way, #300 • Pocatello, Idaho 83201 • (208) 236-6160

Dirk Kempthorne, Governor
Toni Hardesty, Director

November 1, 2005

Certified mail no. 7004 2510 0007 5818 1847

Mr. Charles H. Ross
Agrium Conda Phosphate Operations
3010 Conda Road
Soda Springs, Idaho 83276

Subject: April 2005 Performance Test on Granulation Plant; Facility Identification No. 029-00003

Dear Mr. Ross:

On May 16, 2005, the Department of Environmental Quality (DEQ) received a performance test report for the Granulation Plant at Agrium Conda Phosphate Operation's (Agrium's) Soda Springs facility. Antec Environmental Services (Antec) conducted a fluoride performance test on the common exhaust stack of the venturi scrubbers associated with the granulation plant to satisfy the annual performance test requirements of Subpart BB of Part 63 of Title 40 of the Code of Federal Regulations (40 CFR 63, Subpart BB). Antec conducted the fluoride test on April 15, 2005. The test was conducted pursuant to a test protocol previously approved by DEQ in 2003.

Based on a review of the submitted test report, DEQ has determined that the Environmental Protection Agency (EPA) Method 13B fluoride test on the exhaust stack of the granulation plant was completed and the following deviations were noted.

1. Antec indicated the test was conducted in accordance with the alignment approach published by EPA in Guideline GD-008, October 3, 1989. This approach directs the test contractor to obtain a null reading and determine the flow angle relative to the stack axis using an unobstructed type-S pitot tube.

   Based on the information presented in the performance test report and subsequent information submitted by Antec, the sampling nozzle was not removed from the probe when using the type-S pitot tube to determine the null angle and flow angles. In other words, the type-S pitot tube was obstructed during null and flow angle measurements. Based on correspondence with EPA contact Mr. Peter Westlin, this error in procedure can result in significant errors in flow angle determinations leading to errors in the corrected stack flow rates. **Mr. Westlin suggested one could conclude that a measurement of mass emissions well below (e.g., 30% or more) the applicable emissions limit would be reasonable demonstration of compliance not requiring a retest. The measured mass emissions were within 18% of the applicable emissions limit.**

received 11/4/05
from Rindy Ramos